

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
v.                              )     Docket No. 20-cr-10012-IT  
                                  )  
                                  )  
PAUL BATEMAN              )

**ASSENTED-TO MOTION FOR LEAVE TO FILE  
MEMORANDUM IN EXCESS OF TWENTY PAGES**

Now comes the defendant Paul Bateman and hereby moves, pursuant to Local Rule 7.1(b)(4), for permission to file a memorandum (Motion to Suppress) in excess of twenty pages in this matter. In support of this motion, counsel for the defendant states that his Motion to Suppress addresses the underlying investigation that gave rise to the application and issuance of the search warrant in this case, which involves both the seizure, ultimate search, and “tip” related to a server maintained and hosted abroad. The motion raises both issues of probable cause and material misstatements made in the affidavit in support of the search warrant. In order to properly and thoroughly marshal the facts and apply the law, he requests leave to file a brief in excess of twenty pages.

Pursuant to Local Rule 7.1, counsel conferred with the government and understands that the government assents to this motion. Therefore, defendant moves for leave to file his Motion to Suppress that will be in excess of twenty pages.

Respectfully submitted,  
PAUL BATEMAN  
By His Attorney,

/s/ Sandra Gant  
Sandra Gant, B.B.O.# 680122  
Federal Public Defender Office  
51 Sleeper Street, 5th Floor

Boston, MA 02210  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on December 27, 2021.

*/s/ Sandra Gant*  
Sandra Gant